

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

DENNIS COOK,	:	CASE NO. 1:02cv00073
	:	(J. Weber)
Plaintiff	:	
	:	
vs.	:	
	:	
CITY OF NORWOOD, et al.,	:	
	:	
Defendants	:	

**MOTION TO EXTEND TIME TO
RESPOND TO APPLICATION FOR
ATTORNEYS' FEES AND COSTS**

Comes now Defendant, City of Norwood, by and through counsel, and respectfully moves this Court for an extension of time from February 21, 2005, until and including ***March 21, 2005***, for Defendant, City of Norwood, to respond to Plaintiff's Application for Attorneys' Fees and Costs. Plaintiff does not oppose this Motion.

s/Lawrence E. Barbieri

Lawrence E. Barbieri
Ohio Bar Number: 0027106
Michael E. Maundrell
Ohio Bar Number: 0027110
Attorney for Defendant, City of Norwood
SCHROEDER, MAUNDRELL, BARBIERE & POWERS
11935 Mason Road, Suite 110
Cincinnati, OH 45249
(513) 583-4200
(513) 583-4203 (fax)
Email: lbarbieri@schroederlaw.com

MEMORANDUM

Plaintiff has filed an Application for Attorneys' Fees and Costs in connection with the above captioned case. Plaintiff has also filed a Motion for New Trial and Defendant City of Norwood has filed a Motion for Judgment as a Matter of Law. In light of the time necessary to respond to the post-trial motions and in light of the fact that the post-trial motions may have an impact on the Application for Attorneys' Fees and Costs, this defendant moves to extend the time for Defendant City of Norwood to reply to the Application for Attorneys' Fees and Costs until ***March 21, 2005***. In addition, defendant has requested copies of plaintiff's counsel's expense records which plaintiff has agreed to provide and which have not yet been received and which are necessary to respond to the Application for Fees.

s/Lawrence E. Barbieri

Lawrence E. Barbieri
Ohio Bar Number: 0027106
Michael E. Maundrell
Ohio Bar Number: 0027110
Attorney for Defendant, City of Norwood
SCHROEDER, MAUNDRELL, BARBIERE & POWERS
11935 Mason Road, Suite 110
Cincinnati, OH 45249
(513) 583-4200
(513) 583-4203 (fax)
Email: lbarbieri@schroederlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on **February 17th, 2005**, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to the following: Robert G. Kelly, Esq., ***Attorney for Plaintiff***, W. McGregor Dixon, Jr., Esq., ***Attorney for Joseph J. Hochbein***, James F. Brockman, Esq., ***Attorney for Kevin Cross***, and to Steven Martin, Esq., ***Attorney for Defendant, Gary Hubbard***.

s/ Lawrence E. Barbieri

Lawrence E. Barbieri (0027106)